IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMBO EL ANGARI

AMRO ELANSARI.

Plaintiff, : CIVIL ACTION

CASE NO. 2:21-cv-05325-JHS

VS.

META, INC. d/b/a FACEBOOK,

Defendant.

DEFENDANT META PLATFORM, INC.'S MOTION TO DISMISS COMPLAINT

Pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(6), Defendant Meta Platform, Inc. ("Meta"), by and through its undersigned counsel, hereby submits this Motion to Dismiss Plaintiff's Complaint. As set forth more fully in Meta's Memorandum of Law and Declaration filed herewith, Plaintiff's lacks standing to bring his claims, Plaintiff fails to state a claim upon which relief can be granted, and Meta is immune from suit for the claims asserted under 47 U.S.C. §230.

WHEREFORE, based on the reasons set forth in the accompanying memorandum of law, Meta respectfully requests this Court to dismiss Plaintiff's claims against it, with prejudice.

Dated: February 21, 2022 By: <u>/s/ Stephen P. Hall</u>

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ATTORNEY FOR DEFENDANT META PLATFORMS, INC.

CERTIFICATE OF SERVICE

I, Stephen P. Hall, certify that I caused a true and correct copy of the foregoing Defendant's Motion to Dismiss to be served via regular mail upon the following:

Amro Elansari 130 Justin Drive West Chester, PA 19382

/s/ Stephen P. Hall
Stephen P. Hall

Dated: February 21, 2022